



Defendants request that the Court enforce transfer Plaintiffs' claim to the United States District Court for the District of Columbia.

Respectfully submitted,

**LUNN IRION LAW FIRM, LLC**

BY: /s/ Ronald E. Raney  
Ronald E. Raney, Bar Roll #8570  
P.O. Box 1534  
Shreveport, LA 71165-1534  
Telephone: (318) 222-0665  
Facsimile: (318) 220-3265  
E-mail: rer@lunnirion.com

**ATTORNEYS FOR PMG OPCO-WASHINGTON,  
LLC D/B/A BOOKER T. WASHINGTON SKILLED  
NURSING & REHABILITATION CENTER, AND  
KOURTNEY BROWNLEE**

**CERTIFICATE OF SERVICE**

I certify that on August 16, 2021, a copy of the foregoing was filed with the Clerk of Court by using the CM/ECF system which will send notice of electronic filing to all counsel of record.

/s/ Ronald E. Raney